

LAW OFFICE OF  
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MAY 09 2018

***Via Certified Mailing – Return Receipt***

May 4, 2018

David A. Perata  
President and General Manager  
Managing Agent  
Sonoma-Cutrer Vineyards, Inc.  
4401 Slusser Road  
Windsor, CA 95472

**Re: Notice of Violations and Intent to File Suit Under the Federal Water  
Pollution Control Act (Clean Water Act)**

Dear Mr. Perata and Managing Agent:

**NOTICE OF ALLEGED VIOLATIONS**

This Notice is provided on behalf of California River Watch (“River Watch”) in regard to violations of the Clean Water Act (“CWA” or “Act”), 33 U.S.C. § 1251 *et seq.*, that River Watch believes are occurring at the winery owned and operated by Sonoma-Cutrer Vineyards, Inc. (“Winery”) located at 4401 Slusser Road in Windsor, California. Notice is being sent to you as the responsible owners, operators, and managers of the Winery and real property. This Notice addresses the violations of the CWA, including violation of the new terms of the General California Industrial Storm Water Permit, and the unlawful discharge of pollutants from the Winery indirectly into Mark West Creek.

CWA § 301(a), 33 U.S.C. § 1311(a), prohibits the discharge of any pollutant into waters of the United States unless such discharge is in compliance with various enumerated sections of the Act. Among other things, Section 301(a) prohibits discharges not authorized by, or in violation of, the terms of an individual National Pollutant Discharge Elimination System (“NPDES”) permit or a general NPDES permit issued pursuant to CWA §402(p), 33 U.S.C. § 1342. CWA §402(p), 33 U.S.C. § 1342(p), establishes a framework for regulating storm water discharges under the NPDES program. States with approved NPDES permitting programs are authorized under this section to regulate storm water discharges through permits issued to dischargers and/or through the issuance of a single, statewide general permit applicable to all storm water dischargers. Pursuant to CWA § 402, the Administrator of the U.S. Environmental Protection Agency (“EPA”) has authorized California’s State Water Resources Control Board (“SWRCB”) to issue NPDES permits including general NPDES permits in California.

The SWRCB elected to issue a statewide general permit for industrial discharges and issued NPDES Permit No. CAS000001, SWRCB Order No. 92-12-DWQ (the “General Permit”) on or about November 19, 1991, modified it on or about September 17, 1992, reissued it on or about April 17, 1997, and amended it significantly on April 1, 2014 (effective July 1, 2015), pursuant to CWA § 402(p). In order to discharge storm water lawfully in California, industrial dischargers must comply with the terms of the General Permit or have obtained an individual NPDES permit and complied with its terms.

CWA § 505(b) requires a citizen to give notice of the intent to file suit sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Act. Notice must be given to the alleged violator, the EPA, and the state in which the violations occur. As required by the CWA, this Notice provides notice of the violations that have occurred, and continue to occur at the Winery. Consequently, Sonoma-Cutrer Vineyards, Inc. (referred to hereafter in this Notice as the “Discharger”) is placed on formal notice by River Watch that after the expiration of sixty (60) days from the date of this Notice, River Watch will be entitled to bring suit in the United States District Court against the Discharger for continuing violations of an effluent standard or limitation, NPDES permit condition or requirement, or Federal or State Order issued under the CWA (in particular, but not limited to, CWA § 301(a), § 402(p), and § 505(a)(1), as well as the failure to comply with requirements set forth in the Calif. Code of Federal Regulations and the San Francisco Bay Regional Water Quality Control Board (“RWQCB”) Water Quality Control Plan or “Basin Plan.”

The CWA requires that any notice regarding an alleged violation of an effluent standard or limitation or of an order with respect thereto shall include sufficient information to permit the recipient to identify the following:

**1. The Specific Standard, Limitation, or Order Alleged to Have Been Violated.**

To comply with this requirement, River Watch notices the Discharger of ongoing violations of the substantive and procedural requirements of CWA § 402(p) and violations of NPDES Permit No. CAS000001, SWRCB Order No. 92-12-DWQ as amended by Order No. 97-03-DWQ and Order No. 2014-0057-DWQ (the “General Permit”) relating to recycling services and operations taking place at the Winery.

The Discharger, rather than seeking coverage under an individual NPDES permit, filed a Notice of Intent (“NOI”) agreeing to comply with the terms and conditions of the General Permit. The SWRCB approved the NOI on or about October 15, 1998 and the Discharger is assigned Waste Discharger Identification (“WDID”) number 1 49I014671. River Watch, on the basis of eye-witness reports and records publicly available, and/or records in the possession and control of the Discharger, contends that in the continuing recycling services operations taking place at the Winery, the Discharger has failed and is failing to comply with the strict terms and conditions of the General Permit – specifically the requirements governing sampling and analysis, the foundation upon which the Discharger can prepare and implement effective Best Management Practices (“BMPs”) in its Storm Water Pollution Prevention Plan (“SWPPP”) for the Winery, ensuring the elimination of all non-authorized storm water discharges.

Compliance with these General Permit requirements is central to the effectiveness of the General Permit program. River Watch alleges the Discharger has failed and is failing to comply with the General Permit annual reporting requirements for reporting years 2015-2016 and 2016-2017. The General Permit in effect beginning July 1, 2015 (Order No. 2014-0057-DWQ), revised significantly the reporting requirements for industrial facilities such as the Winery. Under the new General Permit, the Discharger is required to comply with all of the following:

- “Collect and analyze storm water samples from two (2) Qualifying Storm Events (“QSEs”) within the first half of each reporting year (July 1 to December 31), and two (2) QSEs within the second half of each reporting year (January 1 to June 30).” (*see* General Permit § XI.B.2).

River Watch, following review of the available sampling data provided on the SWRCB’s SMARTs reporting database, alleges the Discharger failed to comply with this requirement by sampling and analyzing for only three (3) of the required four (4) samples during the 2015-2016 Annual Reporting Year, for only two (2) of the required four (4) samples during the 2016-2017 Annual Reporting Year, and for none of the required two (2) samples during the first half of the 2017-2018 Annual Reporting Year.<sup>1</sup>

- “Analyze all collected samples for the following parameters: “(a) Total suspended solids (TSS) and oil and grease (O&G); (b) pH ...; (c) Additional parameters identified by the Discharger on a facility-specific basis that serve as indicators of the presence of all industrial pollutants identified in the pollutant source assessment ...” (*see* General Permit § XI.B.6.a.-c.).

River Watch, following review of the “Analytical Reports” of the storm water samples reported by the Discharger for the Winery, alleges the Discharger fails to reveal monitoring and analysis of the full range of pollutants required by the General Permit. The Reports provide sampling results for Oil and Grease, Total Suspended Solids, and pH, but fail to provide sampling results for all the “additional parameters identified by the Discharger on a facility-specific basis that serve as indicators of the presence of industrial pollutant identified in the pollutant source assessment ...” (General Permit § XI.B.6.c). In its May, 2015 SWPPP, the Discharger identifies a broad range of “industrial materials” and “potential pollutant sources” (*see* SWPPP Section 6.0, and Tables 1, 2, and 4 which are attached to this Notice). River Watch alleges the Discharger’s failure to provide full sampling results for all of these parameters is a violation of the General Permit.

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<sup>1</sup> A review of available rain totals provided by U.S. Climate Data identifies 19 QSEs recorded during the July – December 2015 reporting period, 23 QSEs recorded during the July – December 2016 reporting period, 40 QSEs recorded during the January – June 2017 reporting period, and 12 QSEs recorded during the July – December 2017 reporting period (*see* [usclimatedata.com](http://usclimatedata.com)). This data contradicts the statements in the Discharger’s 2015-2016 and 2016-2017 Annual Reports under “Summary of Explanations” that there were insufficient QSEs during these reporting years.

## **2. The Activity Alleged to Constitute a Violation.**

Full compliance with the mandates of the General Permit is not a mere statutory exercise. The lands in the Mark West Creek watershed produce a harvest of unparalleled bounty that draws acclaim worldwide. Failing to care for this critical environment as alleged in this Notice is a violation not only of law, but an abrogation of the trust we demand of Sonoma County landowners. The Winery produces renowned wines – Chardonnay and Pinot Noir among them – on the 415 acres planted in Sonoma County. Founded in 1973, the privately held Winery, in addition to the production of wine, operates a “Visitor Center” offering wine tasting at its Windsor facility.

The Discharger’s operations, defined in Section 1.1. (*Purpose*) in the current SWPPP as “winery,” and classified on the NOI as SIC Code 2084 (“Wines, Brandy, and Brandy Spirits”), trigger monitoring and sampling for the full range of mandated and “additional parameters” listed above. Industrial operations at the Winery are conducted both indoors and outdoors where they are subject to rain events. Because there is no public record of a SWRCB or RWQCB exemption from the collecting and analyzing of the range of pollutants identified in Tables 1, 2, and 4 of the SWPPP, and without implementing the full range of required sampling and analysis, there is no accurate measure by which to determine whether required BMPs under General Permit § X are both implemented at the Winery and effective to ensure no unlawful discharge(s) of the pollutants identified above from the Winery discharge to Mark West Creek – a water of the United States. This concern for effective storm water pollution control extends to the following:

- “process wastewater system [at the winery] that consists of four ponds” identified in Figures 1-4 in the current SWPPP. BMPs in Section 7 are not detailed sufficiently to determine whether these ponds are lined or unlined, and whether they are sufficient to hold all regulated storm water prior to evaporation, reuse, or recycling at the Winery.
- “erosion and sediment control” identified in Section 7.1.5 in the current SWPPP is not detailed sufficiently to determine whether the roadways used for the trucking of supplies to, from, and within the Winery are constructed and maintained to properly control storm water discharges from the Winery.

Note that in addition to the pollution controls set forth in the General Permit, the RWQCB has established water quality standards applicable to facilities such as the Winery. The RWQCB’s Basin Plan includes both a narrative toxicity standard and a narrative oil and grease standard, providing that “[w]aters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses.” The Basin Plan establishes limits on metals, solvents, pesticides, and other hydrocarbons.

## **3. The Person or Persons Responsible for the Alleged Violation.**

The entity responsible for the alleged violations is Sonoma-Cutrer Vineyards, Inc., referred to in this Notice as the Discharger.



**4. The Location of the Alleged Violation.**

The location of the various violations is the permanent address of the Winery at 4401 Slusser Road in Windsor, California, including the waters of Mark West Creek – a water of the United States.

**5. The Date or Dates of Violation or a Reasonable Range of Dates During Which the Alleged Activity Occurred.**

The range of dates covered by this Notice is from July 1, 2015 to May 4, 2018. River Watch will from time to time update this Notice to include all violations which occur after the range of dates covered by this Notice. Some of the violations are continuous in nature, therefore each day constitutes a violation.

**6. The Full Name, Address, and Telephone Number of the Person Giving Notice.**

The entity giving this Notice is California River Watch, an Internal Revenue Code § 501(c)(3) nonprofit, public benefit corporation organized under the laws of the State of California, with headquarters located in Sebastopol, California. River Watch's mailing address is 290 South Main Street, #817, Sebastopol, California 95472.

River Watch is dedicated to protecting, enhancing and helping to restore surface and ground waters of California including coastal waters, rivers, creeks, streams, wetlands, vernal pools, aquifers and associated environs, biota, flora and fauna, and to educating the public concerning environmental issues associated with these environs.

River Watch may be contacted via email: [US@ncriverwatch.org](mailto:US@ncriverwatch.org), or through its attorneys. River Watch has retained legal counsel with respect to the issues set forth in this Notice. All communications should be directed to:

David Weinsoff, Esq.  
Law Office of David Weinsoff  
138 Ridgeway Avenue  
Fairfax, CA 94930  
Tel. 415-460-9760  
Email: [david@weinsofflaw.com](mailto:david@weinsofflaw.com)

**REMEDIAL MEASURES REQUESTED**

River Watch believes that implementation of the following remedial measures are necessary in order to bring the Discharger into compliance with the CWA and reduce the biological impacts from its non-compliance upon public health and the environment surrounding the Winery:

1. Prohibition of the discharge of pollutants including, but not limited to:

- pH, total suspended solids, total organic carbon, or oil & grease (the standard pollutants); and
  - all "Potential Pollutant Sources" listed in Tables 1, 2, and 4 in the Discharger's current SWPPP for the Winery.
2. Preparation and submittal to the RWQCB of a "Reasonable Potential Analysis" for the Winery and its industrial operations.
  3. Preparation of further updates to the Discharger's May, 2015 SWPPP for the Winery that include, but are not limited to, additional BMPs necessary to address any violations of the General Permit identified by required sampling and analysis.

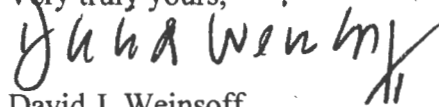
### CONCLUSION

The violations set forth in this Notice effect the health and enjoyment of members of River Watch who reside and recreate in the affected community. Members of River Watch may use the affected watershed for recreation, sports, fishing, swimming, hiking, photography, nature walks and/or the like. Their health, use, and enjoyment of this natural resource is specifically impaired by the Discharger's alleged violations of the CWA as set forth in this Notice.

CWA §§ 505(a)(1) and 505(f) provide for citizen enforcement actions against any "person," including individuals, corporations, or partnerships, for violations of NPDES permit requirements and for un-permitted discharges of pollutants. 33 U.S.C. §§ 1365(a)(1) and (f), §1362(5). An action for injunctive relief under the CWA is authorized by 33 U.S.C. §1365(a). Violators of the Act are also subject to an assessment of civil penalties of up to \$53,484.00 per day/per violation pursuant to Sections 309(d) and 505 of the Act, 33 U.S.C. §§ 1319(d), 1365. *See also* 40 C.F.R. §§ 19.1-19.4. River Watch believes this Notice sufficiently states grounds for filing suit in federal court under the "citizen suit" provisions of CWA to obtain the relief provided for under the law.

The CWA specifically provides a **60-day** "notice period" to promote resolution of disputes. River Watch strongly encourages the Discharger to contact counsel for River Watch within **20 days** after receipt of this Notice to: (1) initiate a discussion regarding the allegations detailed in this Notice, and (2) set a date for a site visit to the Winery. In the absence of productive discussions to resolve this dispute, or receipt of additional information demonstrating the Discharger is in compliance with the strict terms and conditions of the General Permit, River Watch will have cause to file a citizen's suit under CWA § 505(a) when the 60-day notice period ends.

Very truly yours,



David J. Weinsoff

DW:lm

### **Service List**

Scott Pruitt, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N. W.  
Washington, D.C. 20460

Alexis Strauss, Acting Regional Administrator  
U.S. Environmental Protection Agency  
Pacific Southwest, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

Eileen Sobeck, Executive Director  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

David Perata, Registered Agent  
Sonoma-Cutrer Vineyards, Inc.  
1192 State Lane  
Yountville, CA 94509

## Tables



TABLE 1

**LIST OF INDUSTRIAL MATERIALS  
SONOMA-CUTRER VINEYARDS  
WINDSOR, CALIFORNIA**

<b>Industrial Material</b>	<b>Storage Location</b>	<b>Receiving Location</b>	<b>Shipping Location</b>	<b>Handling Location</b>	<b>Quantity Stored</b>	<b>Handling Frequency</b>
#8 BlueShield	Chardonnay Winery; Gas Room/Shop	Chardonnay Winery; Gas Room/Shop	Consumed on-Site	Chardonnay Winery; Gas Room/Shop	211 cu. Feet	Daily
1,2-Propanediol	Chardonnay Winery; Grand CRU Cellar	Chardonnay Winery; Grand CRU Cellar	Consumed on-Site	Chardonnay Winery; Grand CRU Cellar	4100 Gallons	As Needed Basis
Acetylene	Chardonnay Winery; Gas Room/Shop	Chardonnay Winery; Gas Room/Shop	Consumed on-Site	Chardonnay Winery; Gas Room/Shop	513 cu. Feet	Daily
Ammonia	Chardonnay Winery; Outdoor Equipment Pad	Chardonnay Winery; Outdoor Equipment Pad	Consumed on-Site	Chardonnay Winery; Outdoor Equipment Pad	450 lbs	As Needed Basis
Argon (Compressed)	Chardonnay Winery; Gas Room/Shop	Chardonnay Winery; Gas Room/Shop	Consumed on-Site	Chardonnay Winery; Gas Room/Shop	672 cu. Feet	Daily
Carbon Dioxide	Chardonnay Winery; Gas Room/Shop	Chardonnay Winery; Gas Room/Shop	Consumed on-Site	Chardonnay Winery; Gas Room/Shop	1252 cu. Feet	Daily
Celetom (Diatomaceous Earth)	Chardonnay Winery; Triangle Room	Chardonnay Winery; Triangle Room	Consumed on-Site	Chardonnay Winery; Triangle Room	5000 lbs	Daily
Citric Acid Monohydrate	Chardonnay Winery; Triangle Room	Chardonnay Winery; Triangle Room	Consumed on-Site	Chardonnay Winery; Triangle Room	1500 lbs	Daily
DAP (Diammonium Phosphate)	Chardonnay Winery; Triangle Room	Chardonnay Winery; Triangle Room	Consumed on-Site	Chardonnay Winery; Triangle Room	1500 lbs	Daily
Diesel	Chardonnay Winery; Outdoor Equipment Pad	Chardonnay Winery; Outdoor Equipment Pad	Consumed on-Site	Chardonnay Winery; Outdoor Equipment Pad	800 Gallons	During fueling processes
D-Tartaric Acid	Chardonnay Winery; Triangle Room	Chardonnay Winery; Triangle Room	Consumed on-Site	Chardonnay Winery; Triangle Room	8000 lbs	Daily

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Krystal Klear Kwk	Chardonnay Winery	Chardonnay Winery	Consumed on-Site	Chardonnay Winery	500 lbs	As Needed Basis
Lead Battery	In Forklifts throughout the Facility	Chardonnay Winery	Used on-Site; Used batteries shipped from Chardonnay Winery	Where Forklifts are located	6952 lbs	As Needed Basis
Liquefied Petroleum Gas (LPG)	Chardonnay Winery; Outdoor Equipment Pad	Chardonnay Winery; Outdoor Equipment Pad	Consumed on-Site	Chardonnay Winery; Outdoor Equipment Pad	3600 Gallons	As Needed Basis
Nitrogen	Chardonnay Winery; Bodega I and Gas Room/Shop	Chardonnay Winery; Bodega I and Gas Room/Shop	Consumed on-Site	Chardonnay Winery; Bodega I and Gas Room/Shop	258,200 cu. Feet	As Needed Basis
Oxygen	Chardonnay Winery; Gas Room/Shop	Chardonnay Winery; Gas Room/Shop	Consumed on-Site	Chardonnay Winery; Gas Room/Shop	366 cu. Feet	As Needed Basis
Petroleum Hydrocarbon	Chardonnay Winery; Triangle Room	Chardonnay Winery; Triangle Room	Consumed on-Site	Chardonnay Winery; Triangle Room	60 Gallons	Daily
Potassium Metabisulfite	Chardonnay Winery; Triangle Room	Chardonnay Winery; Triangle Room	Consumed on-Site	Chardonnay Winery; Triangle Room	1800 lbs	As Needed Basis
Sodium Percarbonate	Chardonnay Winery; Triangle Room	Chardonnay Winery; Triangle Room	Consumed on-Site	Chardonnay Winery; Triangle Room	4700 lbs	As Needed Basis
Sulfur Dioxide	Chardonnay Winery; Mech. Room	Chardonnay Winery; Mech. Room	Consumed on-Site	Chardonnay Winery; Mech. Room	450 lbs	As Needed Basis
Sulfuric Acid 0.1-0%	Chardonnay Winery; Triangle Room	Chardonnay Winery; Triangle Room	Consumed on-Site	Chardonnay Winery; Triangle Room	700 lbs	As Needed Basis

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Sulfurous Acid	Chardonnay Winery; Triangle Room	Chardonnay Winery; Triangle Room	Consumed on-Site	Chardonnay Winery; Triangle Room	110 Gallons	As Needed Basis
Tri-Gas	Chardonnay Winery; Gas Room/Shop	Chardonnay Winery; Gas Room/Shop	Consumed on-Site	Chardonnay Winery; Gas Room/Shop	211 cu. Feet	As Needed Basis
Acetylene	Chardonnay Winery; Gas Room/Shop Farm Shop; Maint. Const. Supplies Farm Shop; Shop Trucks/Shop	Chardonnay Winery; Gas Room/Shop Farm Shop; Maint. Const. Supplies Farm Shop; Shop Trucks/Shop	Consumed on-Site	Chardonnay Winery; Gas Room/Shop Farm Shop; Maint. Const. Supplies Farm Shop; Shop Trucks/Shop	1419 cu. Feet	Daily
Argon Compressed	Farm Shop	Farm Shop	Consumed on-Site	Farm Shop	280 cu. Feet	As Needed Basis
Argon Compressed	Farm Shop	Farm Shop	Consumed on-Site	Farm Shop	248 cu. Feet	As Needed Basis
Carbon Dioxide	Pinot Winery, Chardonnay Winery; Gas Room/Shop, Farm Shop; Maint. Const. Supplies	Pinot Winery, Chardonnay Winery; Gas Room/Shop, Farm Shop; Maint. Const. Supplies	Consumed on-Site	Pinot Winery, Chardonnay Winery; Gas Room/Shop, Farm Shop; Maint. Const. Supplies	248 cu. Feet	Daily
Diesel	Farm Shop; Gasoline Storage Area	Farm Shop; Gasoline Storage Area	Consumed on-Site	Farm Shop; Gasoline Storage Area	9000 Gallons	Daily
EDTA 9% Zinc	Farm Shop; AG Chemicals	Farm Shop; AG Chemicals	Consumed on-Site	Farm Shop; AG Chemicals	67 Gallons	As Needed Basis

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Ethylene Glycol	Farm Shop; Oil Storage Area	Farm Shop; Oil Storage Area	Consumed on-Site	Farm Shop; Oil Storage Area	55 Gallons	As Needed Basis
Gasoline	Farm Shop; Gasoline Storage Area	Farm Shop; Gasoline Storage Area	Consumed on-Site	Farm Shop; Gasoline Storage Area	2000 Gallons	Daily
Kumulus	Farm Shop; AG Chemicals	Farm Shop; AG Chemicals	Consumed on-Site	Farm Shop; AG Chemicals	2000 lbs	As Needed Basis
LPG	Farm Shop	Farm Shop	Consumed on-Site	Farm Shop	655 Cu. Feet	As Needed Basis
Oxygen	Farm Shop; Maint. Const. Supplies	Farm Shop; Maint. Const. Supplies	Consumed on-Site	Farm Shop; Maint. Const. Supplies	1682 Cu. Feet	As Needed Basis
Petroleum Hydrocarbon	Farm Shop; Oil Storage Area	Farm Shop; Oil Storage Area	Consumed on-Site	Farm Shop; Oil Storage Area	165 Gallons	As Needed Basis
Refined Petroleum Oil	Farm Shop; Oil Storage Area	Farm Shop; Oil Storage Area	Consumed on-Site	Farm Shop; Oil Storage Area	165 Gallons	As Needed Basis
Round Up	Farm Shop; AG Chemicals	Farm Shop; AG Chemicals	Consumed on-Site	Farm Shop; AG Chemicals	110 Gallons	As Needed Basis
Round Up	Farm Shop; AG Chemicals	Farm Shop; AG Chemicals	Consumed on-Site	Farm Shop; AG Chemicals	55 Gallons	As Needed Basis
Used Absorbents	Farm Shop	Farm Shop; AG Chemicals	Disposed	Farm Shop; AG Chemicals	55 Gallons	As Needed Basis
Used Oil Filters	Farm Shop	Farm Shop; AG Chemicals	Disposed	Farm Shop; AG Chemicals	55 Gallons	As Needed Basis
Waste Oil	Farm Shop	Farm Shop; AG Chemicals	Disposed	Farm Shop; AG Chemicals	500 Gallons	As Needed Basis

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Carbon Dioxide	Pinot Winery	Pinot Winery	Consumed on-Site	Pinot Winery	1200 lbs	As Needed Basis
Lime Hydrated Type S	Pinot Winery	Pinot Winery	Consumed on-Site	Pinot Winery	1482 lbs	As Needed Basis
LPG	Pinot Winery	Pinot Winery	Consumed on-Site	Pinot Winery	500 Gallons	As Needed Basis
Nitrogen	Pinot Winery	Pinot Winery	Consumed on-Site	Pinot Winery	852 cu. Ft	As Needed Basis

TABLE 2

**POTENTIAL POLLUTANT SOURCES  
SONOMA-CUTRER VINEYARDS  
WINDSOR, CALIFORNIA**

<i>Classification</i>	<i>Description</i>	<i>Exposed to Storm Water?</i>	<i>Type/Characteristics</i>	<i>Handling Procedures/BMPs</i>	<i>Quantity</i>	<i>Discharge Outlet</i>
Industrial Process	Fueling	Yes	Potential leaks of Hydrocarbons during fueling process and re-fueling of Tank	-Cover Fueling Areas, Implement Spill Prevention Program -Use of dry cleanup methods/absorbents -Secondary containment Structure	See Table 1	Farm Shop ; Discharge Point #3
Industrial Process	Other Onsite vehicles	Yes	Potential leaks of hydrocarbons from mobile vehicles, and equipment	-Implement Spill Prevention Program/Employee Training -Use of dry cleanup methods/absorbents	See Table 1	Entire Campus ; Discharge Points #1-5
Material Handling and Storage Area	Storage	Yes	Potential chemical leaks from chemicals within chemical containers	-Cover chemical storage areas -Minimize container movement -Implement Spill Prevention Program -Used of dry cleanup methods/absorbents	See Table 1	Entire Campus ; Discharge Points #1-5
Material Handling and Storage Area	Storage	Yes	Potential wine leak from a wine line or tank	-Ensuring equipment is in good conditions -Ensure all drains are diverted to appropriate locations based upon activity -Route spilled wine to wastewater treatment ponds	See Table 1	Entire Campus ; Discharge Points #1-5



TABLE 2

**POTENTIAL POLLUTANT SOURCES  
SONOMA-CUTRER VINEYARDS  
WINDSOR, CALIFORNIA**

<i>Classification</i>	<i>Description</i>	<i>Exposed to Storm Water?</i>	<i>Type/Characteristics</i>	<i>Handling Procedures/BMPs</i>	<i>Quantity</i>	<i>Discharge Outlet</i>
Material Handling and Storage Area	Other	Yes	Potential wine leaks from wine tanker trucks	-Ensure all equipment is in good conditions -Ensure drains are diverted to appropriate locations based on activity -Use magnetic mats during transfer -Route spilled wine to wastewater treatment ponds	See Table 1	Entire Campus ; Discharge Points #1-5
Industrial Process	Other	Yes	Failure of process wastewater sumps resulting in process wastewater discharges	-Perform inspections in prescribed intervals depending upon time of year -Perform continual preventative maintenance	See Table 1	Chardonnay and Pinot Area ; Discharge Points # 1, 2, 4, 5
Industrial Process	Other	Yes	Break in line/failure of pumps to the process wastewater system	-Perform inspections in prescribed intervals depending upon time of year -Perform continual preventative maintenance	See Table 1	Chardonnay and Pinot Area ; Discharge Points # 1, 2, 4, 5
Industrial Process	Storage	Yes	Failure or overflow of wastewater ponds located in the Chardonnay Area	-Vegetation management -Pond volume management -Solids dredging	See Table 1	Chardonnay Area ; Discharge Points #1, 2, 5
Industrial Process	Storage	Yes	Failure or overflow of wastewater tanks located in the Pinot Area	-Pond volume management -Solids dredging	See Table 1	Pinot Area ; Discharge Points #4

TABLE 2

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WINDSOR, CALIFORNIA**

<i>Classification</i>	<i>Description</i>	<i>Exposed to Storm Water?</i>	<i>Type/Characteristics</i>	<i>Handling Procedures/BMPs</i>	<i>Quantity</i>	<i>Discharge Outlet</i>
Industrial Process	Manufacturing	Yes	Manufacturing of wine and other industrial activities	<ul style="list-style-type: none"> <li>- Proper diversion of storm water during industrial activities</li> <li>- Educate Facility Personnel about appropriate drain diversions</li> <li>-Schedule organization</li> <li>-Spot Inspections</li> </ul>	See Table 1	Chardonnay and Pinot Area ; Discharge Points # 1, 4

Potential Pollutants						Best Management Practices												Advanced/site Specific BMPs			
						Hydrocarbons															
						Gross Pollutants															
						Trace Metals															
						Toxics															
						Hazardous Chemicals/Inorganics															
						Organics															
						Particulates and Dust															
						SC10-Non-Stormwater Discharges															
						SC11-Spill Prevention Control, and															
						SC-20 Vehicle and Equipment Fueling															
						SC-21 Vehicle and Equipment Cleaning															
						SC30-Outdoor Loading and Unloading															
						SC31-Outdoor Liquid Container Storage															
						SC32-Outdoor Equipment Operations															
						SC33-Outdoor Storage of Raw Material															
						SC34-Waste Handling & Disposal															
						SC40-Contaminated or Erodible															
						SC41-Building & Grounds Maintenance															
						SC-43 Parking/Storage Area															
						SC44-Drainage System Maintenance															
						Storm Resistant Shelters															
						TC22-Extended Detention Basin (Underground)															
						TC30-Vegetated Swale (Vegetated)															
						TC40-Wet Pond (Duck Pond)															
						Diversion Valve to Wastewater System															